

**State of New Jersey**  
**Department of Environmental Protection & Energy**  
**Compliance and Enforcement**  
**Waste Compliance and Enforcement & Release Prevention**  
**Bureau of Discharge Prevention Containment &**  
**Countermeasures**

**A GUIDE TO EMPLOYEE  
TRAINING  
TO CONFORM TO  
DPCC/DCR**

# **REGULATIONS**

## **N.J.A.C.7:1E-2.12**

# **INTRODUCTION**

The purpose of this document is to make

available to both the regulating and regulated community a general guide for training employees at major facilities for compliance with N.J.A.C. 7:1E-2.12.

The document is a compilation of material prepared by Dennis Mahoney of PSE&G for Cook College DPC/DCR training seminars and members of the Bureau of Discharge Prevention Staff.

# **EMPLOYEE TRAINING**

Owners/Operators of major facilities shall implement a training program for those employees involved in the handling of hazardous substances.

## **AREAS OF CONCERN REGARDING TRAINING ARE:**

- Training Periods
- Minimum Training
- Site Rules and Safety Procedures
- Identification of Environmentally Sensitive Areas
- On the Job Training
- Refresher Training

- Qualifying Procedures
- Trainers' Qualifications
- Outside Contractor Training Requirements
- Standard Operating Procedures
- Written Description

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## **TRAINING PERIODS**

Specified time periods of in-house training for each position covering:

- Orientation

- Specific training on hazardous substances
- On-The-Job (OTJ) training
- Trainee evaluation
- Final qualification
- Periodic refresher training

### **EXAMPLE**

Newly assigned 'Plant Operators" will receive "Orientation" training during the first week of assignment. Training on the "XYZ" system will last for 24 hours and will follow the outline as indicated in section \_\_\_\_\_.

"XYZ TRAINING MODULE" the pre-requisite is successful completion of "Orientation" training.

"OTJ" training will take place immediately following "XYZ TRAINING MODULE" and will last for 8 hours.

Final qualifications will be through the use of the "XYZ MODULE" checklist. The qualifying time will be \_\_\_\_\_. The maximum time period for a newly assigned "Plant Operator" is \_\_\_\_\_ weeks from start of assignment.

Refresher training will be once a year.

Tracking of training will be accomplished by supervisor's on the job observations.

## **MINIMUM TRAINING**

The training received by employees shall contain, at a minimum:

General Orientation and initial training of new employees before assignment to hazardous substance operation, which shall include:

- General Site Rules
- Safety Practices
- The DCR Plan
- ID of all environmentally sensitive areas delineated in plan

Classroom training for new or newly assigned employees involved with hazardous substances, covering:



- Details of the SOP's for hazardous substances
- Specific safety issues related to hazardous substances
- MSDS for hazardous substances
- Safe handling practices for the hazardous substances
- Hazards of operation for hazardous substances
- Emergency procedures for fire, leaks and discharges involving hazardous substances

## **SITE RULES AND SAFETY PROCEDURES**

During the course of their training all major facility employees must be made aware of the hazards they could encounter in their work area.

They must learn the hazards that face them and the precautions they must take when they are around the following:

- Storage Tanks, Drums, Railcars
- Process Buildings
- Transfer Areas
- Security Areas
- Fences
- Gates
- Other Structures Where Hazardous Substances are  
Handled

## **IDENTIFICATION OF** **ENVIRONMENTALLY SENSITIVE** **AREAS**

Employees must be trained to be aware of any Environmentally Sensitive Areas and why they must be protected.

Where appropriate they must become familiar with the following:

- Wetlands and Wetland Areas
- Bay Island and Barrier Island Corridors
- Dunes

- Wild Scenic Recreational, or Developed Recreational Rivers
- Surface Waters
- Water Intakes and Wells
- Beaches
- Breeding Areas and Migratory Stopovers
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## **ON THE JOB TRAINING**

On-the-job training for newly assigned employees shall include, at a minimum:

- Equipment Familiarization
- Operating Data Collection and Entry

- Actual Equipment Startup and Shutdown
- Control and Adjustment of Operating Parameters
- Application of SOP's to Actual Conditions
- Recognition of Abnormal Operating Conditions

## **REFRESHER TRAINING**

Refresher training shall be conducted at least once per year. Refresher training will present an overview and updated information on:

- SOP's
- MSDS
- Safe Handling Practices
- Emergency Procedures

## **QUALIFYING PROCEDURES**

Procedures to determine whether an employee has demonstrated the ability to carry out the duties and responsibilities of a specific position.

## **Example**

All plant operators will be tested both orally and in writing during the qualifying period. The combined tests will measure cognitive and psycho-motor skills of the trainee. The oral test will consist of a check-list, derived from the SOP's....etc.

All trainees must pass each test with a minimum grade of 70%. Any trainee who fails the testing phase will not be qualified as a "Plant Operator". The tests will be administered by an "Operator Supervisor" and "Plant Trainer" (See section \_\_\_\_\_ "Qualified Instructor".)

## **TRAINERS' QUALIFICATIONS**

The training program shall specify the qualifications required by those personnel responsible for conducting hazardous substance training. The documentation of all training received by the trainer, that qualifies him/her to instruct employees, should be available for review upon request of the department.

## **OUTSIDE CONTRACTORS Training Requirements**

Owners or operators shall have documents available to ensure that all employees used by outside contractors have received appropriate orientation and training prior to working with or around hazardous substances.

## **STANDARD OPERATING PROCEDURES** **(SOP)**

Verify that the facility maintains SOP's which conform to regulatory requirements. The SOP's must be written in English in a manner understandable by employees and in the language of fluency of employees not fluent in English and readily available to employees.

Determine if the SOP's include simplified process flow sheets and a process description defining the process and showing: flows; temperatures and pressures/ procedures and conditions for normal operations; a description of the most common abnormal conditions, including the control and mitigating procedures to be followed; a description of leak or discharge conditions which could occur; including the control and mitigation procedures to be followed to reduce the impact of the leak or discharge, pre-startup procedures; startup procedures including conditions to be maintained; shutdown procedures including provisions for normal and emergency shutdown and details on the condition of equipment to be maintained after shutdown.

Determine that a current index of up-to-date SOP's are maintained at the facility.

## **WRITTEN DESCRIPTION**

Verify that the written job descriptions include: the duties and responsibilities relating to hazardous substances for each position; the education, experience and training necessary to qualify for the position; a procedure to determine an employee has demonstrated the ability to carry out the duties and responsibilities of the specific position; specified time periods of in house training, for each position; specific hazardous substance training, on the job training, trainee evaluation, final qualification and periodic refresher training.

## **EXAMPLE**

Plant Operator

General Duties: Operate pumps, boilers and associated equipment....etc.

DPCC Duties: Operate pumps and associated equipment as per the standard operating procedures....etc. Performs emergency response for all spills from hazardous substance equipment....etc.

Education: High School graduate or equivalent

Experience: Two years as an Assistant Operator

Training: Must successfully pass the DPCC course, with minimum grade of 70% where given. Must successfully pass the Emergency Response Course with a minimum grade of 70%....etc.



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